



General Services Administration
Office Of Finance (BC)
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Washington, D.C. 20405

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12/29/97

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DEC 18 1997

Ms. Cynthia L. Johnson
Director, Cash Management Policy
and Planning Division
Financial Management Service
US Department of the Treasury
Room 420
401 14th Street SW
Washington, DC 20227

Dear Ms. Johnson:

Thank you in advance for the opportunity to comment on the proposed rulemaking entitled Management of Federal Agency Disbursements. One of the concerns the General Services Administration (GSA) has is the lack of sufficient space in the CCD+ addendum record to furnish the payment identification information. With a maximum of 80 characters, much of that reserved for possible interest charges and other agency identifying data, leaves very little room for vendor supplied invoice numbers. This is especially true for some industries, such as utilities, which utilize large account numbering systems. It is feared, that because of this drawback, electronic funds transfer (EFT) payment mechanisms may not be suited for some of the smaller utility companies that are not internet capable to retrieve the remittance data from the GSA CFO home page.

In Section 208.7- Agency Responsibilities. The proposed rulemaking suggests that agencies collect the EFT banking data as a condition of contract award, issuance of a purchase order, or formalizing an agreement to obtain goods or services. Without requiring the EFT data to be obtained up front, but rather encouraging it, will place this responsibility on the paying offices. With the paying offices having to obtain this data payments will be delayed possible harming the small business community.

Finally, in Section 208.9-Compliance, provides for Treasury to monitor agencies compliance with the EFT mandate. The GSA does not feel it is appropriate to penalize agencies who fail to comply due to no fault of there own. Automated feeder systems that generate payees names and addresses must be modified to accommodate this data. Also, if a penalty must be imposed the rulemaking should dictate that the penalties paid are from funds available for the administration of the program for which the penalty was incurred.

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ACW



Any questions pertaining to the above, contact Mr. Michael Gilmartin on 202-501-4444.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. E. Suda', with a stylized, cursive script.

Robert E. Suda
Director of Finance(BC)